The Honorable James L. Robart 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 MICROSOFT CORPORATION, a Washington corporation, CASE NO. C10-1823-JLR 10 Plaintiff, REPLY IN SUPPORT OF DEFENDANTS' 11 MOTION TO FILE DOCUMENTS UNDER SEAL IN SUPPORT OF 12 v. MOTOROLA'S MOTION IN LIMINE 13 MOTOROLA, INC., and MOTOROLA NOTE ON MOTION CALENDAR: MOBILITY LLC, and GENERAL Friday, August 9, 2013 14 INSTRUMENT CORPORATION, 15 Defendants. 16 17 18 19 20 21 22 23 24 25 26

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO SEAL RE MOTIONS FOR SUMMARY JUDGMENT AND TO PRECLUDE TESTIMONY OF MENENBERG AND BODEWIG CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

1	Because Motorola meets the standards for sealing as discussed in the moving brief (Dkt.
2	No. 794), and because Microsoft (<i>see</i> Dkt. No. 834) does not oppose Motorola's Motion to File
3	Documents Under Seal in Support of Motorola's Motion in Limine, and offers additional support
4	why Motorola's Motion should be granted, Motorola respectfully requests that the Court grant the
5	Motion, and seal the following:
6	Defendants' [Sealed] Motion in Limine (Dkt. No. 797)
7	 Exhibit B to the Declaration of Andrea Pallios Roberts in Support of Defendants' Motion in Limine (Dkt. No. 797)
8	DATED this 9th day of August, 2013.
9	Respectfully submitted,
10 11	SUMMIT LAW GROUP PLLC
12	By /s/ Ralph H. Palumbo
12	By /s/ Philip S. McCune
13	Ralph H. Palumbo, WSBA #04751
	Philip S. McCune, WSBA #21081
14	ralphp@summitlaw.com
15	philm@summitlaw.com
16	By <u>/s/ Thomas V. Miller</u>
17	Thomas V. Miller
L /	MOTOROLA MOBILITY LLC
18	600 North U.S. Highway 45
19	Libertyville, IL 60048-1286 (847) 523-2162
20	QUINN EMANUEL URQUHART &
21	SULLIVAN, LLP
22	By /s/ Kathleen M. Sullivan
23	Kathleen M. Sullivan, NY #1804624 51 Madison Ave., 22 nd Floor
23 24	New York, NY 10010 (212) 849-7000
24 25	kathleensullivan@quinnemanuel.com
26	

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO SEAL RE MOTIONS FOR SUMMARY JUDGMENT AND TO PRECLUDE TESTIMONY OF MENENBERG AND BODEWIG - 1 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 Fifth Avenue South, Suite 1000 Seattle, Washington 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

1	By /s/ Brian C. Cannon
2	Brian C. Cannon, CA #193071 555 Twin Dolphin Drive, 5 th Floor
	Redwood Shores, CA 94065
3	(650) 801-5000
4	briancannon@quinnemanuel.com
5	By /s/ William C. Price
6	William C. Price, CA #108542 865 S. Figueroa Street, 10 th Floor
	Los Angeles, CA 90017
7	(213) 443-3000
8	williamprice@quinnemanuel.com
9	Attorneys for Motorola Solutions, Inc., Motorola Mobility LLC and General
10	Instrument Corp.
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO SEAL RE MOTIONS FOR SUMMARY JUDGMENT AND TO PRECLUDE TESTIMONY OF MENENBERG AND BODEWIG - 2 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001

CERTIFICATE OF SERVICE 1 I hereby certify that on this day I electronically filed the foregoing with the Clerk of the 2 Court using the CM/ECF system which will send notification of such filing to the following: 3 Arthur W. Harrigan, Jr., Esq. 4 Christopher T. Wion, Esq. Shane P. Cramer, Esq. 5 Calfo Harrigan Leyh & Eakes LLP arthurh@calfoharrigan.com 6 chrisw@calfoharrigan.com shanec@calfoharrigan.com 7 Richard A. Cederoth, Esq. 8 Brian R. Nester, Esq. David T. Pritikin, Esq. 9 Douglas I. Lewis, Esq. John W. McBride, Esq. 10 William H. Baumgartner, Jr., Esq. David C. Giardina, Esq. 11 Carter G. Phillips, Esq. 12 Constantine L. Trela, Jr., Esq. Ellen S. Robbins, Esq. 13 Nathaniel C. Love, Esq. Sidley Austin LLP 14 rcederoth@sidley.com bnester@sidley.com 15 dpritikin@sidley.com dilewis@sidley.com 16 jwmcbride@sidley.com wbaumgartner@sidley.com 17 dgiardina@sidley.com cphillips@sidley.com 18 ctrela@sidley.com erobbins@sidley.com 19 nlove@sidley.com 20 T. Andrew Culbert, Esq. 21 David E. Killough, Esq. Microsoft Corp. 22 andycu@microsoft.com davkill@microsoft.com 23 DATED this 9th day of August, 2013. 24 /s/ Marcia A. Ripley 25 Marcia A. Ripley 26

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO SEAL RE MOTIONS FOR SUMMARY JUDGMENT AND TO PRECLUDE TESTIMONY OF MENENBERG AND BODEWIG - 3 CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC

315 FIFTH AVENUE SOUTH, SUITE 1000 SEATTLE, WASHINGTON 98104-2682 Telephone: (206) 676-7000 Fax: (206) 676-7001